

**Graydon  
Head &  
Ritchey  
LLP**

*Attorneys at Law*

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April 28, 2004

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL  
2004 MAY 10 10:11:39

Ana J. Peña-Wallace  
Attorney  
999 E. Street, N.W.  
Federal Election Commission  
Washington, D.C. 20463

Re: **MUR 5335R**  
**Geoff Davis 2002 (a/k/a Geoff Davis for Congress Committee)**  
**Joe Green, Treasurer (a/k/a Jody Green)**

Dear Ms. Peña-Wallace:

Pursuant to your correspondence of March 2, 2004 and our subsequent telephone conversation, enclosed please find the Affidavit of Jody Green, Treasurer for Geoff Davis 2002. Also enclosed is the Affidavit of Marc Wilson, general consultant to Geoff Davis.

As we discussed on the telephone, if, after your review of the answer to the questions set forth in your letter are such that the FEC would pursue further action, my client would request pre-probable cause conciliation in this matter.

Should you have any questions, please do not hesitate to give me a call.

Very truly yours,

GRAYDON HEAD & RITCHEY LLP



Richard L. Robinson

RLR/ds  
Enclosure  
C: Mr. Geoff Davis  
Mr. Joe Green

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**FEDERAL ELECTION COMMISSION  
99 E. STREET, N.W.  
WASHINGTON, DC 20463**

**AFFIDAVIT**

RESPONDENT: Geoff Davis for Congress  
Committee and Joe Green,  
As Treasurer

MUR 5335R

COMMONWEALTH OF KENTUCKY)  
COUNTY OF Kenton

2004 MAY 10 A 11:39

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COMMISSION  
OFFICE OF GENERAL  
COUNSEL

Comes now the Affiant, Marc Wilson, and after being first duly cautioned and sworn,  
states as follows:

1. During the time which is the subject of this case, I was general consultant to Geoff Davis, a candidate for U.S. Congress in the 2002 election cycle.
2. I reside at \_\_\_\_\_
3. I have reviewed the letter from Ana J. Peña-Wallace dated April 2, 2004 relative to statements attributed to me regarding whether a parent can legally make contributions to a candidate on behalf of their children. I cannot recall any such statements.
4. As general consultant, I dealt primarily with political and press issues for the campaign. I did not give the campaign any advice on campaign finance laws or regulations.
5. The only conversations I had with anyone regarding this incident were in response to an initial press call: (a) contacting William Shehan to inquire as to the age of Georgia and Suzannah Shehan; (b) conversations with campaign staff immediately following that call; and (c) replies to the initial and additional press calls. In none of these conversations do I recall making any statement indicating it was allowable under federal law for parents to make campaign contributions on behalf of their children.

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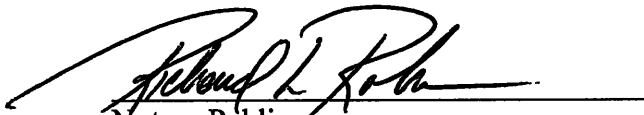


Further Affiant sayeth naught.



Marc Wilson

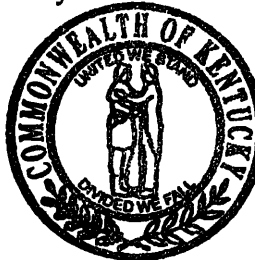
Sworn to before me and subscribed in my presence by Marc Wilson this 19<sup>th</sup> day of April, 2004.



Notary Public

Print Name:

My Commission Expires:



**RICHARD L. ROBINSON**

Notary Public, Kentucky

State At Large

My Commission Expires

January 26, 2008



FEDERAL ELECTION COMMISSION  
999 E. STREET, N.W.  
WASHINGTON, DC 20463

AFFIDAVIT

RESPONDENT: Geoff Davis for Congress MUR 5335R  
Committee and Joe Green,  
As Treasurer

COMMONWEALTH OF KENTUCKY)  
COUNTY OF KENTON )

Comes now the Affiant, Jody "Joe" Green, after being first duly cautioned and sworn, states as follows:

1. I am the Treasurer for Geoff Davis 2002 ("Committee"), the principal campaign committee for Geoff Davis, a candidate for the United States Congress (KY-04) in the 2002 election cycle.

2. I reside at [redacted] I am in receipt of the letter from Ana J. Peña-Wallace, counsel for the Federal Election Commission, dated April 2, 2004, requesting responses to various questions regarding contributions received by the Committee from Georgia Shehan and Susan Shehan (the "Shehan Contributions"). In response to said letter, attached please find a printout from a campaign database indicating to whom "best efforts" letters were sent during the time in question.

Further Affiant sayeth naught.

Jody Green

Sworn to before me and subscribed in my presence by Jody Green this 30<sup>th</sup> day of April, 2004.

Lori Schwetschenau  
Notary Public  
My Commission Expires



LORI SCHWETSCHENAU  
Notary Public, Kentucky  
State At Large  
My Commission Expires  
May 6, 2007



Mr.	Scott		Alsip	PO Box 31432	Cincinnati	OH
Mr.	Robert	L.	Athey	1128 W. Wrightwood	Chicago	IL
Mr.	Bret	A.	Caller	1789 Eastwood Drive	Lexington	KY
Mr.	Steven	H.	Caller	1805 Lake Hill Circle	Lexington	KY
Mrs.	Margaret	B.	Deters	975 Riva Ridge Court	Union	KY
Mr.	Wayne		Erckson	506 Ripple Creek	Elsmere	KY
Mr.	K. Scott		Fischer	1 Harding Lane	Rumson	NJ
Mrs.	Renate	M.	Glenn	54 Fairway Drive	Southgate	KY
Mr.	Fred	L.	Jackson	20305 Country Club Drive	Catlettsbur	KY
Mr.	Jeffrey	A.	King	5343 Coral Berry Drive	Columbus	OH
Ms.	Mary	S.	Knock	6 Springside Drive	Cold Spring	KY
Ms.	Susan	A.	Lamb	PO Box 1355	Florence	KY
Mr.	Michael		Mansh	1454 Schirra Drive	Ambler	PA
Mr.	Perrin		March, III	7 Grandin Place	Cincinnati	OH
Ms.	Barbara	E.	McGrath	10596 Fallis Road	Loveland	OH
Mr.	Mark	H.	O'Brien	1302 Bellewood Road	Anchorage	KY
Mr.	Richard	B.	Robinson	145 South Harbor Drive	Key Largo	FL
Ms.	Susan		Shehan	107 Mount Zion	Florence	KY
Ms.	Monica	E.	Shores	1109 Grindstone Court	Union	KY
Mr.	Brett	S.	Snyder	903 Duswhirl Drive	Union	KY
Mr.	Larry	C.	Tomlinson	701 South Royal Street	Mobile	AL
Mrs.	Viola		Van Zandt	6501 Shelburn Circle	Crestwood	KY
Mr.	Michael	D.	Vice	460 Melwood Lane	Morehead	KY
Mr.	John	A.	Webb	PO Box 1554	Ashland	KY
Mr.	Mark		Wellinghoff	4380 Kalama Court	Cincinnati	OH
Mr.	David		Wells	1900 Cranston Road	Morehead	KY
Mr.	Greg		Wells	460 Melwood Lane	Morehead	KY
Mr.	Glenn	E.	Wilson	1213 Potomac Place	Louisville	KY
Mr.	Clifford	A.	Worthing	802 Wakefield Drive	Cincinnati	OH
Mr.	Michael	D.	Young	8167 Trotters Chase	Cincinnati	OH



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